

# **EXHIBIT 6**



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July 5, 2024

**VIA [Email]**

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**Re: *In re: National Prescription Opiate Litigation*, MDL No. 2804 (N.D. Ohio)  
*Webb County v. Purdue Pharma, L.P. et al.*, Case No. 1:18-op-45175-DAP  
(Track 15) Discovery Letter**

Counsel:

I write on behalf of Plaintiff Webb County, Texas (the “County”) in further response to the PBM Defendants’ June 18, 2024 letter and June 28, 2024 email.

**I. Custodian Selection and Available ESI**

The attached chart contains more than adequate detail for PBM Defendants to select additional Webb custodians. For 49 persons, we are providing the years of employment, earliest email, names and titles.

There are a number of former Webb employees or former elected officials about whom the PBMs have inquired and for whom our IT review is ongoing. These are persons who left County government before the suit was filed. Webb is reviewing its archive of back-up tapes for any potentially responsive documents or emails belonging to these individuals. We will provide an update on this review by July 15, 2024.

In addition, the County proposes additional custodians below. For each, the County retains more than 200 emails:

<b>Name</b>	<b>Earliest Email</b>	<b>Years of Employment</b>
Michael Gonzalez (Sheriff’s Office, Sargeant in charge of Narcotics)	2014	2014-present
Monica Flores (Director of HR; Interim Director of Risk Management)	2023	2023 - present
Guillermo Walls (Director, Community Action Agency)	2023	2023 - present

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Federico Calderon (Sheriff's Office, Commander, Patrol)	2008	2005 - present
Tano Tijerina (County Judge; Director of Emergency Management)	2015	2015 - present
Pedro Alfaro (Director of Risk Management)	2018	2018 - 2023

In response to your June 28 email, we have clarified our chart headers in the attached.

## **II. Interrogatory Responses**

The County's second supplemental response to Interrogatory No. 1 is attached. The County will supplement its responses to Interrogatories Nos. 4 and 5 as soon as the requested information becomes available.

Sincerely,



James Hannaway

Encl.

cc: PBM@listserv.motleyrice.com  
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